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May 5, 2021

Via E-mail to:
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Clerk of the Court
United States District Court
Western District of Washington
1717 Pacific Avenue
Tacoma, Washington 98402

Re: *Request for DMCA Subpoena to Reddit, Inc.*

Dear Clerk of the Court:

Petitioner Grow Your Brand Social, LLC (“Grow Your Brand Social”), through its undersigned counsel of record, hereby respectfully requests that the Clerk of this Court issue a Subpoena pursuant to 17 U.S.C. § 512(h) to service provider Reddit, Inc.’s to identify alleged infringers of Grow Your Brand Social’s copyrighted material.

Grow Your Brand Social is the owner of numerous copyrighted audiovisual works. In the course of protecting its works, Grow Your Brand Social has determined that infringing copies of these works, posted at the direction of individual users and without authorization from Grow Your Brand Social, appear on Reddit, Inc.’s websites, listed in the Proposed DMCA Subpoena. Such infringements have been ongoing and Grow Your Brand Social has issued DMCA notifications to Reddit, Inc.’s DMCA Agent. All notifications have met the requirements of 17 U.S.C. § 512(c)(3)(A) by setting forth, inter alia, a representative list of the copyrighted works that have been infringed and the identification and location on Reddit, Inc.’s website of the infringing material. Grow Your Brand Social now seeks to obtain a DMCA Subpoena to learn the identity of the individuals who are posting the infringing content.

In order to fully comply with 17 U.S.C. 512(h) DMCA Subpoena requirements, the following items are submitted concurrently with this letter request:

- Copies of notifications sent to Reddit Inc.’s DMCA Agent (attached as Exhibit B to the Declaration of Jason Tucker, President of Battleship Stance, Inc. (“Battleship”) and Exhibit B to the DMCA Subpoena);

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- DMCA Subpoena (proposed); and,
- Sworn Declaration of Jason Tucker, President of Battleship, confirming that the purpose of the DMCA Subpoena is to obtain the identity of the alleged infringers for the single purpose of protecting Grow Your Brand Social's rights under Title 17 of the United States Code.

With all conditions for issuance of the DMCA Subpoena having been met, Grow Your Brand Social therefore petitions the Clerk to issue and sign, in accordance with 17 U.S.C. § 512(h)(4), the proposed DMCA Subpoena, and return it to the undersigned requester for delivery to the service provider Reddit, Inc..

Regards,

s/ Spencer D. Freeman

Spencer D. Freeman

SDF:sl

Attachments:

- Proposed DMCA Subpoena
- Sworn Declaration
- Notification of Claimed Infringements
(attached to Subpoena and Declaration)